

editing means for deleting the second object and connecting the first and the third objects according to contents of said first, second and third table means, when the second object is selected.

### **REMARKS**

In the February 14, 2003 Office Action, the Examiner noted that claims 1-16 were pending in the application and were rejected under 35 U.S.C. § 102(b) as anticipated by Microsoft Organization Chart (Reference U). Claim 4 has been cancelled and thus, claims 1-3 and 5-16 remain in the case. The Examiner's rejections are traversed below.

#### **The Prior Art: Microsoft Organization Chart**

Cited as "Microsoft Org Chart" were 14 screen shots of Microsoft Organization Chart Version 2.0 which has a copyright date of October 16, 1995 according to Fig. (1) of the screen shots. Fig. (2) shows a hierarchical chart with one box at the top level, three boxes at the second level, each connected to the top level, and a series of three boxes labeled "1", "2", and "3" in sequence below the left-most box at the second level. Fig. (3) is similar to Fig. (2), except the box labeled "2" has a reverse image (a white "2" in a black box) and Fig. (4) is similar to Fig. (2), except there are only two numbered boxes with the last box labeled "3" in the position of the box labeled "2" in Fig. (2). Fig. (5) is similar to Fig. (2), except that the legends in the first two levels are different and the third level has two additional boxes labeled "1" also connected to the left-most box on the second level. Fig. (6) is the same as Fig. (5) with the box labeled "2" having a reverse image and Fig. (7) is similar to Fig. (4) with the two additional boxes label "1" from Fig. (5). Fig. (8) is similar to Fig. (2), except that there are two additional boxes labeled "2" at the next to last level, with each of the boxes labeled "2" connected to the box labeled "1". A single box labeled "3" is connected to only one of the boxes labeled "2". Fig. (9) is similar to Fig. (8), except that all of the boxes labeled "2" have a reverse image. Fig. (10) is identical to Fig. (4), except for the labeling of the boxes in the first two rows. Fig. (11) is similar to Fig. (5), except that the last row has three boxes labeled "3", each of which is connected to the box labeled "2". Fig. (12) is similar to Fig. (11), except that the box labeled "2" has a reverse image. Fig. (13) is similar to Fig. (7), except that there are three boxes labeled "3", each of which is connected to the first box labeled "1". Fig. (14) is similar to Fig. (4), except the legends in the boxes on the first two levels are different, the last box labeled "3" has a reverse image and a box labeled "2" has been added on the third level connected to the middle box on the second level.

### **Rejections under 35 U.S.C. § 102(b)**

In items 2-14 on pages 2-4 of the Office Action, claims 1-16 were rejected under 35 U.S.C. § 102(b) as anticipated by Microsoft Organization Chart. In item 3 on page 2 of the Office Action, claims 1, 11, and 15 were rejected with reference to Figs. (2)-(4) of the Microsoft Organization Chart screen shots. Claims 1, 11 and 15 have been amended to recite details of how information is stored according to the present invention, for example as illustrated in Figs. 6 and 7 of the application. Nothing in the screen shots provided as "Microsoft Org Chart" teaches or even suggests how data is stored to produce the displays in Figs. (1)-(14). Therefore, it is submitted that claims 1, 11 and 15 patentably distinguish over Microsoft Organization Chart.

In items 4 and 5 on page 2 of the Office Action, claims 2 and 3 were rejected with reference to Figs. (4) and (2), respectively, of the Microsoft Organization Chart screen shots. Since claims 2 and 3 depend from claim 1, it is submitted that claims 2 and 3 patentably distinguish over Microsoft Organization Chart for the reasons discussed above.

In item 7 on page 2 of the Office Action, claim 5 was rejected with reference to Figs. (8)-(10) of the Microsoft Organization Chart screen shots. However, as discussed above, what is illustrated in Fig. (8) of the Microsoft Organization Chart screen shots is a single block labeled "3" connected to only one of three blocks labeled "2", while claim 5 recites "a third object connected to the plurality of second objects" (claim 5, lines 4-5). Thus, Fig. (8) of the Microsoft Organization Chart screen shots would have to be modified to add lines between the block labeled "3" and the other two blocks labeled "2" to match what is recited in claim 5. Therefore, Figs. (8)-(10) do not illustrate what is recited in claim 5.

Furthermore, even if screen shots of Microsoft Organization Chart were provided corresponding to what is recited in claim 5, more would be required to reject claim 5. Claim 5 recites a device including "an editor deleting the plurality of second objects and connecting the first and third objects when the plurality of second objects are selected" (claim 5, last three lines). There is nothing in the Microsoft Organization Chart screen shots to suggest that Microsoft Organization Chart Version 2 was capable of automatically deleting blocks labeled "2" and connecting blocks labeled "1" and "3" if intermediate blocks labeled "2", each connected to both block "1" and block "3", are selected.

There are many computer programs capable of generating illustrations like those in Figs. (8)-(10) of the Microsoft Organization Chart screen shots or that would produce the beginning and ending displays recited in claim 5. However, known programs require manual

operations to produce drawings like those provided as screen shots from Microsoft Organization Chart. In particular, there is no known prior art device capable of performing the operation of the editor recited in claim 5. If screen shots from a program are used to reject the claims in the future, the rejection will need to be accompanied by an Affidavit describing the operation of the program as performing deletion "when the plurality of second objects are selected" (claim 5, last two lines). Since no such Affidavit was provided in rejecting the claims, withdrawal of the rejection of claim 5 is respectfully requested.

In paragraph 8 on page 3 of the Office Action, claim 6 was rejected over Microsoft Organization Chart based on Figs. (11)-(13). However, claim 6 recites "a second object connected to the plurality of first objects and a plurality of third objects connected to the second object" (claim 6, lines 3-5)" as illustrated in Fig. 12A of the application. The result of the operation performed by the editor as recited in the last four lines of claim 6 is illustrated in Fig. 12B of the application. It should be immediately apparent that the illustration in Fig. 11 does not match the illustration in Fig. 12A, nor do any of the other screen shots cited as "Microsoft Org Chart." Furthermore, as discussed above with respect to claim 5 an Affidavit would be required to reject claim 6 under 35 U.S.C. § 102(b). Therefore, withdrawal of the rejection of claim 6 is respectfully requested.

In paragraph 9 on page 3 of the Office Action, claim 7, 12 and 16 were rejected with reference to Figs. (2) and (14) generated by Microsoft Organization Chart. All of these claims include the limitation "deleting the second object and connecting the first and third objects when the second object is moved to a predetermined area" (claims 7, 12 and 16, last three lines). It is unclear what the Examiner believes Fig. (14) shows as a "predetermined area" which causes deletion of a second object and connection of first and third objects. The same number of boxes are illustrated in Figs. (2) and (14). As discussed above, the differences between Figs. (2) and (14) are that a block labeled "2" is added at the third level connected to the middle block of the second level and instead of blocks "2" and "3" connected in series below the block labeled "1", a single block labeled "3" having a reverse image is connected below the block labeled "1". Therefore, Fig. (14) does not even correspond to the resulting display described in claims 7, 12 and 16. Even if the citation had been to Fig. (4) which corresponds to the ending display in claims 7, 12 and 16, there would still be a question of how the screen shots were generated. For the reasons discussed above, without an Affidavit the Microsoft Organization Chart screen shots are insufficient to reject claims 7, 12 and 16. Therefore, withdrawal of this rejection is also requested.

In paragraph 10 on page 3 of the Office Action, claim 8 was rejected with reference to Figs. (2) and (14) of the Microsoft Organization Chart screen shots. Assuming that what is illustrated in Fig. (14) is a "second object ... moved to a specific relative position from a position of the graphic" (claim 8, last three lines) illustrated in Fig. (2), without an Affidavit stating that the connection of the blocks labeled "1" and "e" was performed automatically by the computer in response to movement of the block labeled "2" by a user, claim 8 can not be rejected over Microsoft Organization Chart for the reasons discussed above. Therefore, withdrawal of the rejection of claim 8 is respectfully requested.

In paragraphs 11 and 12, claim 9 was rejected with reference to Figs. (1)-(3) and claim 10 was rejected with reference to Fig. (2) of the Microsoft Organization Chart screen shots. Since claims 9 and 10 depend from claim 7, it is submitted that claims 9 and 10 patentably distinguish over Microsoft Organization Chart for the reasons discussed above with respect to claims 7, 12 and 16. Furthermore, as discussed above with respect to claim 5, the screen shots alone do not provide evidence that the Microsoft Organization Chart program automatically "corrects a distance between the first and third objects according to a predetermined condition" (claim 9, last three lines) or "manages the third object" (claim 10, line 5) in the manner recited in claim 10. Therefore, unless an Affidavit or other additional evidence is provided, withdrawal of the rejection of claims 9 and 10 is respectfully requested for these additional reasons.

In paragraph 13 on page 3 of the Office Action, claim 13 was rejected with reference to Figs. (2)-(4) of the Microsoft Organization Chart screen shots. Claim 13 has been amended in a manner similar to claims 1, 11 and 15 and therefore, it is submitted that claim 13 patentably distinguished over Microsoft Organization Chart for the reasons discussed above with respect to claims 1, 11 and 15.

In paragraph 14 on pages 3-4 of the Office Action, claim 14 was rejected with reference to Figs. (2)-(4) of the Microsoft Organization Chart screen shots. The last three lines of claim 14 recite the same limitation as the last three lines of claim 7. Therefore, it is submitted that claim 14 patentably distinguishes over Microsoft Organization Chart for the reasons discussed above with respect to claims 7, 12 and 16.

## **Summary**

It is submitted that the screen shots cited as representing "Microsoft Org Chart" do not show all of the limitations recited in the claims and standing alone without an Affidavit describing the operations performed to generate the screen shots are insufficient evidence to



## VERSION WITH MARKINGS TO SHOW CHANGES MADE

### IN THE CLAIMS:

Please CANCEL claim 4 and AMEND the claims according to the following:

1. (ONCE AMENDED) A graphic editing device, comprising:
  - a display unit [displaying] to display a graphic including a first object, a second object and a third object that are connected in series via lines;
  - a storage unit, coupled to said display unit, to store a first table with position information that indicates a position of each object displayed on said display unit, a second table with line information that identifies the lines connecting the first, second and third objects, and a third table with preceding information that identifies an object preceding each object, if any; and
  - an editor, coupled to said display unit and said storage unit, to delete [deleting] the second object and connecting the first and [the] third objects according to contents of the first, second and third tables in said storage unit, when the second object is selected.
2. (ORIGINAL) The graphic editing device according to claim 1, wherein:
  - said editor displays the third object in a position where the second object used be displayed when the second object is selected and deleted.
3. (ORIGINAL) The graphic editing device according to claim 1,
  - further comprising a coordinate system providing unit providing a virtual coordinate system in which each box is defined as an area for displaying an object,
  - wherein said display unit displays each object using the virtual coordinate system and said editor locates each object using the virtual coordinate system.
5. (ORIGINAL) A graphic editing device, comprising:
  - a display unit displaying a graphic including a first object, a plurality of second objects connected to the first object and a third object connected to the plurality of second objects; and
  - an editor deleting the plurality of second objects and connecting the first and third objects when the plurality of second objects are selected.

6. (ORIGINAL) A graphic editing device, comprising:  
a display unit displaying a graphic including a plurality of first objects, a second object connected to the plurality of first objects and a plurality of third objects connected to the second object; and  
an editor deleting the second object and connecting each of the plurality of first objects and each of the plurality of third objects when the second object is selected.
7. (ORIGINAL) A graphic editing device, comprising:  
a display unit displaying a graphic including a first object, a second object and a third object that are connected in series; and  
an editor deleting the second object and connecting the first and third objects when the second object is moved to a predetermined area.
8. (ORIGINAL) A graphic editing device, comprising:  
a display unit displaying a graphic including a first object, a second object and a third object that are connected in series; and  
an editor deleting the second object and connecting the first and third objects when the second object is moved to a specific relative position from a position of the graphic.
9. (ORIGINAL) The graphic editing device according to claim 7, wherein said editor corrects a distance between the first and third objects according to a predetermined condition.
10. (ORIGINAL) The graphic editing device according to claim 7, further comprising a management unit managing a sequence of the objects, said management unit manages the third object as a subordinate object to the first object, if the second object is subordinate to the first object and the third object is subordinate to the second object before the second object is deleted.
11. (ONCE AMENDED) A graphic editing method, comprising:  
displaying a first object, a second object and a third object that are connected in series via lines;  
storing in a first table position information which indicates a position of each object displayed;

storing in a second table line information which identifies the lines connecting the first, second and third objects;

storing in a third table preceding information which identifies an object preceding each object, if any; and

deleting the second object and connecting the first and third objects according to contents of the first, second and third tables, when the second object is selected.

12. (ORIGINAL) A graphic editing method, comprising:

displaying a first object, a second object and a third object that are connected in series; and

deleting the second object and connecting the first and third objects when the second object is moved to a predetermined area.

13. (ONCE AMENDED) A storage medium that stores a program [executed by] to control a computer[, the program] to perform a process comprising: [a program code of]

displaying a graphic including a first object, a second object and a third object that are connected in series via lines;

storing in a first table position information which indicates a position of each object displayed;

storing in a second table line information which identifies the lines connecting the first, second and third objects;

storing in a third table preceding information which identifies an object preceding each object, if any; and [a program code of]

deleting the second object and connecting the first and third objects according to contents of the first, second and third tables, when the second object is selected.

14. (ORIGINAL) A storage medium that stores a program executed by a computer, the program comprising:

a program code of displaying a graphic including a first object, a second object and a third object that are connected in series; and

a program code deleting the second object and connecting the first and third objects when the second object is moved to a predetermined area.



15. (ONCE AMENDED) A graphic editing device, comprising:

displaying means for displaying a graphic including a first object, a second object and a third object that are connected in series via lines;

first table means for storing position information which indicates a position of each object displayed on said display unit;

second table means for storing line information which identifies the lines connecting the first, second and third objects;

third table means for storing preceding information which identifies an object preceding each object, if any; and

editing means for deleting the second object and connecting the first and the third objects according to contents of said first, second and third table means, when the second object is selected.

16. (ORIGINAL) A graphic editing device, comprising:

displaying means for displaying a graphic including a first object, a second object and a third object that are connected in series; and

editing means for deleting the second object and connecting the first and third objects when the second object is moved to a predetermined area.